



ITS TELECOMMUNICATIONS SYSTEMS, INC.

15925 SW Warfield Blvd. • P.O. Box 397 • Indiantown, Florida 34956
772-597-2111 • www.itstelecom.net

April 16, 2019

Office of the Secretary
Attn: Chief, Pricing Policy Division
Room 5-A225
445 12th Street, SW
Washington, DC 20554

Re: Section 254(g) Certification – Interexchange Rate Integration and Rate Averaging
ITS Telecommunications Systems, Inc.

ITS Telecommunications Systems, Inc. respectfully files the enclosed Section 254(g) (47 U.S.C. § 254(g)) Certification. We are filing the attached Section 254(g) Certification in compliance with Section 64.1900 of the Commission's rules (47 C.F.R. § 64.1900). The certification has been made by an officer of ITS Telecommunications Systems, Inc. pursuant to the Commission's rule for sworn statements.

If you have any questions regarding the Section 254(g) Certification, please contact me at 772-597-2106.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bruce Russell".

Bruce Russell
Chief Financial Officer

Enclosures

Serving our community for over 50 years.

**2018 Annual Section 254(g) Certification
Of ITS Telecommunications Systems, Inc.
May 1, 2019**

1. My name is Bruce Russell. I currently serve as the Chief Financial Officer of ITS Telecommunications Systems, Inc., a provider of interstate interexchange telecommunication services as a toll reseller in the state of Florida. In this capacity, I have become familiar with the network operations of ITS Telecommunications Systems, Inc. and its pricing policies including compliance with Section 254(g) of the Communications Act, as amended (47 U.S.C. § 254(g)).
2. ITS Telecommunications Systems, Inc. has provided its interstate interexchange services since November, 1993.
3. ITS Telecommunications Systems, Inc. is in compliance with Section 254(g). Specifically, a) the rates charged by ITS Telecommunications Systems, Inc. for interexchange telecommunication services to subscribers in rural and high cost areas are no higher than the rates charged by ITS Telecommunications Systems, Inc. to its subscribers in urban areas, and b) the rates charged by ITS Telecommunications Systems, Inc. for interstate interexchange telecommunication services to its subscribers in each State are no higher than the rates charged to its subscribers in any other State.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 16, 2019.



Bruce Russell
Chief Financial Officer
ITS Telecommunications Systems, Inc.
15925 SW Warfield Boulevard
Indiantown, Florida 34956